

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MICK HAIG PRODUCTIONS, E.K.,

Plaintiff,

v.

DOES 1-670

Defendant.

CA. 3:10-cv-01900-N

AFFIDAVIT OF MATTHEW ZIMMERMAN

1. I am an *ad litem* counsel for the Defendants in this matter and a member in good standing of the California State Bar. I have personal knowledge of the matters stated in this declaration. If called upon to do so, I am competent to testify to all matters set forth herein.
2. My 2011 hourly rate, which is the hourly rate for purposes of this matter, is \$550.00 per hour.
3. My time spent on the response to the motion for stay and motion for contempt sanctions is as follows:

<u>Date</u>	<u>Task</u>	<u>Hours</u>
24-Oct-11	Confer with co-counsel re: response to motion for stay and motion for contempt sanctions; draft response.	1.25
28-Oct-11	Confer with co-counsel regarding filing; draft and edit response.	2.50
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Total hours:		3.75

4. At my hourly rates, my additional fees for time spent working on the response to the motion for stay and motion for contempt sanctions are \$2,062.50.

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct. Executed October 29, 2011, in San Francisco, California.

/s/ Matthew Zimmerman
Matthew Zimmerman